

CULLEN & DYKMAN LLP  
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*Counsel for The College of Saint Rose*

UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF NEW YORK

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	:
In re:	: Chapter 11
	:
THE COLLEGE OF SAINT ROSE,	: Case No. 24-11131 (REL)
	:
	:
Debtor.	:
	:
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**NOTICE OF MONTHLY FEE STATEMENT FOR DEBTOR'S COUNSEL  
FOR THE PERIOD OF APRIL 1, 2025 THROUGH APRIL 30, 2025**

PLEASE TAKE NOTICE that pursuant to the Order of the Bankruptcy Court dated November 5, 2024 Establishing Procedures for Interim Compensation and Reimbursement of Expenses of Professionals, the Monthly Fee Statement for Debtor's Counsel for the period of April 1, 2025 through April 30, 2025 is attached hereto.

Dated: Albany, New York  
May 19, 2025

CULLEN AND DYKMAN LLP  
*Counsel for Debtor*

By: s/ Bonnie Pollack  
Matthew G. Roseman, Esq.  
Bonnie L. Pollack, Esq.  
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Albany, New York 12207  
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THE COLLEGE OF SAINT ROSE  
432 WESTERN AVENUE  
ALBANY, NY 12203

May 6, 2025

**File Number: 22484-000-3**

**Control Number 7556322**

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**RE: BANKRUPTCY FILING**

Enclosed is our bill for professional services rendered and disbursements advanced through April 30, 2025.

Should you have any questions, please call me. Your prompt payment would be greatly appreciated.

Sincerely Yours,

DINA VESPIA

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FOUNDED 1850

NEW YORK NEW JERSEY WASHINGTON DC



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May 6, 2025

### INVOICE SUMMARY

File Number: 22484-000-3

Control Number 7556322

RE: BANKRUPTCY FILING

FOR PROFESSIONAL SERVICES rendered through April 30, 2025 in connection with the above referenced matter, as more fully detailed on the attached.

Professional Services	\$ 64,099.00
Disbursements	<u>\$ 584.01</u>
<b>TOTAL THIS INVOICE</b>	<b>\$ 64,683.01</b>



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May 6, 2025

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**RE: BANKRUPTCY FILING**

**PROFESSIONAL SERVICES**

**B100 GENERAL ADMINISTRATION**

Date	Atty	Task	Actv	Description	Hours	Amount
4/01/25	BLP	B100		Finalize and file master service list	.20	163.00
4/01/25	DV	B100		Meeting w/ B. Pollack to discuss pending matters.	.30	118.50
4/03/25	BLP	B100		Comms re collection of contract monies due and basis and background of same	.40	326.00
4/03/25	BLP	B100		Comms with UST re plan and status	.20	163.00
4/03/25	BLP	B100		Comms with CITE and college re money owed to college and their defenses	.30	244.50
4/07/25	BLP	B100		Comm to client re call re workers comp trust and strategy re same (2); review and revise plan and motion timeline requested by client (.3)	.50	407.50
4/07/25	BLP	B100		Continued comms re CITE money owed, schedule call to discuss same	.20	163.00
4/07/25	BLP	B100		Discussion with Marsh re workers comp trust monies owed and resolution of same	.40	326.00
4/07/25	MGR	B100		Review and discuss time line internally.	.40	348.00
4/07/25	DV	B100		Meeting w/ B. Pollack to discuss pending matters.	.40	158.00
4/07/25	DV	B100		Prepared timeline re: pending motions/filings.	.80	316.00

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Date	Atty	Task	Actv	Description	Hours	Amount
4/07/25	DV	B100		Meeting re: workers' comp distribution and discussion w/ B. Pollack re: same.	.50	197.50
4/07/25	DV	B100		Reviewed email from CITE re: money owed	.20	79.00
4/08/25	BLP	B100		Comms with client re security deposit accounts and distribution of funds from same	.20	163.00
4/08/25	BLP	B100		Comms with client re PBGC issues, claims, workers comp trust issues (.3); comms with client re logistics for hearing, no appearance (.2)	.50	407.50
4/08/25	BLP	B100		Participate in weekly call with client and FTI re status and strategy for all matters in case	.80	652.00
4/08/25	MGR	B100		Prepare for and participate in working call with client and FTI team regarding case status and plan docuemnts in preparation for board meeting.	1.00	870.00
4/08/25	DV	B100		Emails w/ L. Thomson re: meeting preparation.	.20	79.00
4/08/25	DV	B100		Emails and telephone call w/ M. White re: hearing logistics for 4/9 hearings.	.30	118.50
4/09/25	BLP	B100		Comms with client re no DOE claim filed, financials to be finalized for plan (.2); comms with client re outcome of hearings in case, date of DS hearing (.2); comms with client re orders, Bill of Sale issues (.2)	.60	489.00
4/09/25	MGR	B100		Review agenda for board meeting and phone conf w/ B Pollack regarding hearings on record retention and sale of personal property	.40	348.00
4/10/25	BLP	B100		Call with CITE re money owed (.2); follow up comms with client and DV re same and issues (.4)	.60	489.00
4/10/25	DV	B100		Meeting w/ CITE re: receivables.	.40	158.00
4/10/25	DV	B100		Telephone calls w/ B. Pollack and D. Polley re: CITE receivables.	.40	158.00
4/10/25	DV	B100		Emails w/ D. Polley re: CITE receivables.	.20	79.00
4/11/25	BLP	B100		Comms with client re CITE dispute and strategy with same	.40	326.00

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Date	Atty	Task	Actv	Description	Hours	Amount
4/11/25	DV	B100		Emails and telephone call w/ B. Pollack re: CITE receivables.	.30	118.50
4/11/25	DV	B100		Reviewed email from M. McLane re: CITE receivables.	.20	79.00
4/14/25	BLP	B100		Comms with BH re worker comp trust issues and assignment of recoveries	.20	163.00
4/15/25	BLP	B100		Call with United Educators re money owed to College, resolution on payment of same (.2); comms with email re same (.2); comms re necessity for EMMA notices for plan (.2)	.60	489.00
4/15/25	MGR	B100		Review email regarding need for EMMA notice and discuss same.	.30	261.00
4/16/25	BLP	B100		Comms with client and UST re Q1 amount of trustee fees, sales of property, closing statements, statement re results of sale	.40	326.00
4/17/25	BLP	B100		Comms with CITE, client re CITE dispute, follow up re payment	.30	244.50
4/18/25	BLP	B100		Comms with BHs, UST re variance report and MOR	.20	163.00
4/21/25	DV	B100		Meeting w/ B. Pollack to discuss pending matters.	.40	158.00
4/22/25	BLP	B100		Call with client and FTI re status of all bankruptcy matters and items needed to be done	.70	570.50
4/22/25	MGR	B100		Review meeting agenda and prepare for meeting.	.50	435.00
4/22/25	MGR	B100		Attend and participate in working group meeting with FTI and client team.	.60	522.00
4/22/25	DV	B100		Meeting w/ College leadership re: pending matters.	.80	316.00
4/22/25	DV	B100		Telephone call w/ M. White re: pending matters.	.30	118.50
4/24/25	DV	B100		Emails w/ B. Pollack re: post-confirmation matters.	.20	79.00
4/29/25	BLP	B100		Conference with DV re CGA, pension issues	.30	244.50
4/29/25	BLP	B100		Comms with BHs re voting, turnover of receivables to BHs	.20	163.00
4/29/25	BLP	B100		Weekly status call with client and FTI	.70	570.50

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Date	Atty	Task	Actv	Description	Hours	Amount
4/29/25	MGR	B100		Participate in working group conf call with client and FTI.	.60	522.00
4/29/25	DV	B100		Meeting w/ B. Pollack to discuss pending matters.	.40	158.00
4/29/25	DV	B100		Meeting w/ College leadership to discuss pending matters.	.80	316.00
<b>TASK SUB TOTAL</b>						<b>\$ 13,364.00</b>

**B120B CASH COLLATERAL & DIP FINANCING**

Date	Atty	Task	Actv	Description	Hours	Amount
4/18/25	BLP	B120B		Review variance report	.20	163.00
4/18/25	MGR	B120B		Review cash flow variance report	.40	348.00
<b>TASK SUB TOTAL</b>						<b>\$ 511.00</b>

**B130B ASSET DISPOSITION, SALE OR RESTRUCTURE**

Date	Atty	Task	Actv	Description	Hours	Amount
4/01/25	BLP	B130B		Comms with client and BHs re final piano sales, reduction in target prices	.20	163.00
4/04/25	BLP	B130B		Further comms with BHs and client re piano sales, and reduction in price	.20	163.00
4/10/25	BLP	B130B		Comms re President's house escrow information in response to client request (.2); comms with client re execution of Bill of Sale for personal property and logistics of same (.2)	.40	326.00
4/15/25	BLP	B130B		Comms re Bill of Sale and payment for personal property	.20	163.00
4/16/25	BLP	B130B		Review BR 6004(f) and review content needed for statements of results of both property sales	.40	326.00

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Date	Atty	Task	Actv	Description	Hours	Amount
4/16/25	MGR	B130B		Review bankruptcy rule 6004 and discuss filing w/ B Pollack.	.50	435.00
4/17/25	BLP	B130B		Prepare and file notice of campus closing	.40	326.00
4/17/25	BLP	B130B		Prepare and file notice of PH closing	.30	244.50
4/25/25	BLP	B130B		Comms re Authority bill of sale, vehicle titles	.30	244.50
4/28/25	BLP	B130B		Comms with client re vehicle titles for Authority, finalizing sale of personal property	.20	163.00
4/30/25	BLP	B130B		Further comms with client re finalizing sale of personal property, payment to BHs	.20	163.00

**TASK SUB TOTAL**

**\$ 2,717.00**

**B140B RESOLUTION OF CREDITOR ISSUES**

Date	Atty	Task	Actv	Description	Hours	Amount
4/01/25	BLP	B140B		Conference with DV re possible governmental claims	.30	244.50
4/01/25	BLP	B140B		Call with client re PBGC claims and issues and HHS claim	1.00	815.00
4/01/25	BLP	B140B		Several comms with DV and B. Diaz re components of PBGC claim and strategy with same	.50	407.50
4/02/25	BLP	B140B		Comms with client, FTI re amended DOL claim	.20	163.00
4/02/25	BLP	B140B		Comms with client and FTI re PBGC claims and other priority claims	.80	652.00
4/02/25	MGR	B140B		Review amended department of labor claim.	.30	261.00
4/04/25	BLP	B140B		Comms with client re PBGC claim issues, HHS claim issues, other possible governmental claims	.40	326.00
4/04/25	BLP	B140B		Review and analyze all priority and other governmental claims	1.10	896.50
4/07/25	BLP	B140B		Conference with DV re claims analysis re priority claims	.40	326.00



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Date	Atty	Task	Actv	Description	Hours	Amount
4/07/25	MGR	B140B		Review emails regarding NY AG proposed claim and issues regarding same	.30	261.00
4/23/25	BLP	B140B		Review HHS claim and analyze objection areas (.3); comms with HHS re withdrawal of claim (.2)	.50	407.50
4/28/25	MGR	B140B		Review emails regarding PBGC claim	.30	261.00
<b>TASK SUB TOTAL</b>						<b>\$ 5,021.00</b>

**B160B PLAN & DISCLOSURE STATEMENT**

Date	Atty	Task	Actv	Description	Hours	Amount
4/03/25	BLP	B160B		Revise plan documents	.90	733.50
4/04/25	BLP	B160B		Make final plan changes per board meeting	.50	407.50
4/04/25	BLP	B160B		Comms with BHs and UST with plan documents	.20	163.00
4/08/25	BLP	B160B		Emails (.2) and call (.3) with AG re plan language requested by AG, call re proposed claim	.50	407.50
4/09/25	BLP	B160B		Revise plan documents for governmental claims	.70	570.50
4/09/25	BLP	B160B		Comms with client and FTI re final plan documents and exhibits to approve filing (.2); review exhibits from FTI (.4)	.60	489.00
4/09/25	BLP	B160B		Comms with BHs re preliminary discussion of plan comments	.20	163.00
4/09/25	MGR	B160B		Final review of plan document	.50	435.00
4/09/25	MGR	B160B		Final review of disclosure statement and revised liquidation analysis	.50	435.00
4/09/25	MGR	B160B		Review revised liquidation analysis and waterfall in preparation for board meeting.	.40	348.00
4/10/25	BLP	B160B		Comms with client and FTI re additional edits to plan documents needed	.30	244.50
4/10/25	MGR	B160B		Review revised liquidation analysis	.30	261.00

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Date	Atty	Task	Actv	Description	Hours	Amount
4/11/25	BLP	B160B		Review final changes to plan documents from clients (.4); discussion with FTI re amounts in changes (.3)	.70	570.50
4/11/25	BLP	B160B		Finalize all plan documents and exhibits for filing and file same	1.20	978.00
4/11/25	BLP	B160B		Review order scheduling DS hearing (.2); conference re service of same and plan documents (.2)	.40	326.00
4/11/25	DV	B160B		Reviewed emails re: final plan documents.	.30	118.50
4/15/25	MGR	B160B		Review Judge Littlefield decision in Prime Capital Partners regarding plan administrator and discuss same w/ B Pollack.	.80	696.00
4/17/25	BLP	B160B		Discussion with BH counsel re plan documents, concepts	.80	652.00
4/17/25	BLP	B160B		Compile plan calculations per BH request (.2); several comms with client and FTI re same, review of proposed analyses (.4)	.60	489.00
4/17/25	BLP	B160B		Review and respond to requested plan changes from DIP lender	.20	163.00
4/17/25	MGR	B160B		Prepare for and participate in conf call with bondholder counsel regarding comments to plan and disclosure statement	.80	696.00
4/17/25	MGR	B160B		Review and discuss comments to plan from DIP Lender	.40	348.00
4/18/25	BLP	B160B		Comms with FTI and BH counsel re calculations in plan	.30	244.50
4/21/25	BLP	B160B		Conference with DV re BH plan issues	.20	163.00
4/22/25	BLP	B160B		Call with M. White re confirmation testimony, proffer	.20	163.00
4/23/25	BLP	B160B		Review Prime Capital decision denying confirmation for impact on case	.50	407.50
4/23/25	BLP	B160B		Conference with MR re Prime Capital case, distinguishing same and confirmation strategy in light of same	.40	326.00
4/23/25	MGR	B160B		Discuss Judge Littlefield Prime Capital decision and impact on plan administrator; discuss distinguishing factors w/ B Pollack.	.50	435.00

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Date	Atty	Task	Actv	Description	Hours	Amount
4/28/25	BLP	B160B		Comms with client re revisions to Plan and DS to be made (.1); comms with M. White re appearance at DS hearing, if needed conflict (.1)	.20	163.00
4/28/25	MGR	B160B		Emails w/ B pollack regarding need for client attendance at DS hearing.	.20	174.00
4/30/25	BLP	B160B		Comms with BHs re plan issues	.10	81.50

**TASK SUB TOTAL** **\$ 11,852.00**

**B170B LEASES & EXECUTORY CONTRACTS**

Date	Atty	Task	Actv	Description	Hours	Amount
4/01/25	MGR	B170B		Emails regarding vehicle use agreement.	.30	261.00
4/23/25	BLP	B170B		Comms with client re contract rejection order and dates for rejection damage claims	.20	163.00

**TASK SUB TOTAL** **\$ 424.00**

**B180B RETENTION/PROFESSIONAL COMPENSATION/FEE**

Date	Atty	Task	Actv	Description	Hours	Amount
4/07/25	BLP	B180B		Revise fee chart (.2); comms with client re payment of Feb professional fees (.1)	.30	244.50
4/11/25	BLP	B180B		Prepare March monthly fee statement	1.30	1,059.50
4/17/25	BLP	B180B		Prepare and file notice of all professional fee statements	.40	326.00

**TASK SUB TOTAL** **\$ 1,630.00**

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**B185B PREPARATION FOR/ATTEND COURT HEARING**

Date	Atty	Task	Actv	Description	Hours	Amount
4/07/25	BLP	B185B		Prepare for record retention hearing	.70	570.50
4/07/25	BLP	B185B		Prepare for hearing on sale of personal property	.70	570.50
4/09/25	BLP	B185B		Continued preparation for hearings	.50	407.50
4/09/25	BLP	B185B		Attend hearings in case (record retention, sale of personal property)	.50	407.50
4/22/25	BLP	B185B		Prepare for rejection motion hearing	.30	244.50
4/23/25	BLP	B185B		Attend contract rejection hearing	.50	407.50
<b>TASK SUB TOTAL</b>						<b>\$ 2,608.00</b>

**B210B MOTION PRACTICE**

Date	Atty	Task	Actv	Description	Hours	Amount
4/01/25	BLP	B210B		Discussion with K. Owens re changes requested to record retention order	.20	163.00
4/02/25	BLP	B210B		Review further changes re abandonment motion	.20	163.00
4/04/25	BLP	B210B		Review reserve account statements for abandonment motion	.20	163.00
4/07/25	BLP	B210B		Finalize abandonment motion and compile exhibits to same to send to client for review	.30	244.50
4/08/25	BLP	B210B		Revise record retention order per PBGC requests	.30	244.50
4/08/25	DV	B210B		Emails w/ B. Pollack re: record retention order.	.20	79.00
4/09/25	BLP	B210B		Prepare personal property sale order	.30	244.50
4/09/25	BLP	B210B		Prepare notice of hearing and finalize/file abandonment motion	.70	570.50
4/09/25	BLP	B210B		Upload orders from hearing	.20	163.00
4/09/25	DV	B210B		Emails w/ D. Polley re: CGA abandonment motion.	.20	79.00

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Date	Atty	Task	Activ	Description	Hours	Amount
4/16/25	BLP	B210B		Comms with AG office re abandonment motion (.2); review additional COS re same (.1)	.30	244.50
4/16/25	BLP	B210B		Comms with KeyBank re service of abandonment motion, questions re same and Key Bank obligations under motion	.30	244.50
4/16/25	MGR	B210B		Review and discuss email from Keybank regarding motion to abandon.	.30	261.00
4/16/25	DV	B210B		Emails w/ B. Pollack re: CGA motion.	.10	39.50
4/16/25	DV	B210B		Emails w/ B. Pollack re: correspondence w/ counsel for KeyBank Trust.	.20	79.00
4/18/25	BLP	B210B		Further comms with Key Bank re service of abandonment motion	.20	163.00
4/21/25	BLP	B210B		Conference with DV re KeyBank abandonment motion issues	.20	163.00
4/22/25	BLP	B210B		Prepare rejection order	.20	163.00
4/22/25	BLP	B210B		Conference with DV and comms M. Shuster re Key Bank continued questions on CGA abandonment (.3); discussion with creditor re case, notices, distribution (.2)	.50	407.50
4/22/25	BLP	B210B		Comms with client re service/notice of abandonment motion on CGA participants	.20	163.00
4/22/25	DV	B210B		Reviewed emails from KeyBank Trust re: CGA motion and discussion re: same.	.30	118.50
4/23/25	BLP	B210B		Prepare and file rejection order (.2); confer w/ staff re service of signed order (.2)	.40	326.00
4/24/25	BLP	B210B		Review comms from Dept of Financial services re abandonment motion (.3); conference with DV re same and PBGC document requests (.2)	.50	407.50
4/24/25	DV	B210B		Emails and telephone call w/ B. Pollack re: CGA and NYSDFS response.	.30	118.50
4/24/25	DV	B210B		Reviewed email from NYSDFS re: CGA abandonment motion.	.40	158.00

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Date	Atty	Task	Actv	Description	Hours	Amount
4/29/25	BLP	B210B		Comms with DFS re annuitant letter in connection with abandonment motion	.20	163.00
4/29/25	BLP	B210B		Call with Dept of Financial Services re CGA abandonment motion (.3); conference with DV re same and response to concerns (.2)	.50	407.50
4/29/25	BLP	B210B		Prepare letter to annuitants re tax consequences of abandonment motion (.3); comms with client re same (.2)	.50	407.50
4/29/25	DV	B210B		Meeting w/ NYDFS re: CGA abandonment motion.	.40	158.00
4/29/25	DV	B210B		Telephone calls w/ B. Pollack re: CGA matters.	.20	79.00
4/29/25	DV	B210B		Emails w/ client re: letter to CGA annuitants.	.30	118.50
4/30/25	BLP	B210B		Comms with DFS and client re letter to annuitants satisfies concern re abandonment motion	.20	163.00
<b>TASK SUB TOTAL</b>						<b>\$ 6,667.00</b>

#### B220B OPERATING REPORTS

Date	Atty	Task	Actv	Description	Hours	Amount
4/18/25	BLP	B220B		Review and populate MOR	.80	652.00
4/18/25	BLP	B220B		Comms with FTI re question on income statement in MOR	.20	163.00
4/29/25	BLP	B220B		Comms with UST re March MOR (.1); refile same because of error in original filing (.2)	.30	244.50
<b>TASK SUB TOTAL</b>						<b>\$ 1,059.50</b>

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**B230A GOVERNANCE ISSUES**

Date	Atty	Task	Actv	Description	Hours	Amount
4/01/25	BLP	B230A		Participate in call with Bd Exec Comm re walk through of plan and approval of same	1.90	1,548.50
4/01/25	MGR	B230A		Review notes in preparation for participating in Executive Committee meeting to review the plan and disclosure statement.	.50	435.00
4/01/25	MGR	B230A		Participate in Executive Committee meeting to review the plan and disclosure statement.	1.50	1,305.00
4/01/25	DV	B230A		Attended Executive Committee meeting.	2.00	790.00
4/01/25	RG	B230A		Attend to issues re board minutes and governance.	1.30	513.50
4/02/25	RG	B230A		Attend to issues re board minutes and governance.	1.10	434.50
4/09/25	DV	B230A		Reviewed and revised materials for board meeting.	.50	197.50
4/10/25	BLP	B230A		Participate in Exec Comm meeting re plan, remainder of case	1.00	815.00
4/10/25	MGR	B230A		Attend and participate in executive committee conference call.	1.00	870.00
4/10/25	DV	B230A		Attended Executive Committee meeting.	1.10	434.50
<b>TASK SUB TOTAL</b>						<b>\$ 7,343.50</b>

**B240B EDUCATION/REGULATORY MATTERS**

Date	Atty	Task	Actv	Description	Hours	Amount
4/08/25	DV	B240B		Reviewed request for clinic records.	.20	79.00
4/09/25	DV	B240B		Reviewed requests for clinic records and emails re: same.	.40	158.00
4/09/25	DV	B240B		Emails w/ J. Richardson re: clinic record request and review of same.	.20	79.00



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**TASK SUB TOTAL**

**\$ 316.00**

**B250B ENDOWMENT/ATTORNEY GENERAL MATTERS**

Date	Atty	Task	Actv	Description	Hours	Amount
4/07/25	BLP	B250B		Comms re AG claim for endowment funds proposed to be filed	.20	163.00
4/07/25	DV	B250B		Reviewed AG claim.	.20	79.00
4/07/25	DV	B250B		Emails re: AG claim.	.30	118.50
4/07/25	DMM	B250B		Email to B. Fronning re: status of petition to modify notice to donor requirement for cy pres petition.	.10	39.50
4/07/25	DMM	B250B		Attention to statement in Chapter 11 draft regarding the disposition of the endowment funds if cy pres is not approved prior to termination of Plan Administrator agreement.	.20	79.00
4/08/25	DV	B250B		Prepared for and attended meeting w/ AAG to discuss cy pres petition and plan language.	.60	237.00
4/10/25	BLP	B250B		Comms with AN re Heuther release issues	.20	163.00
4/10/25	AN	B250B		Emails to/from counsel regarding Huether release.	.50	197.50
4/21/25	DV	B250B		Emails re: endowment fund and status of transfer.	.30	118.50
4/28/25	DV	B250B		Email to NYAG re: status of cy pres review.	.20	79.00
4/29/25	DMM	B250B		Reviewing and commenting on petition to modify notice requirement for cy pres petition.	1.70	671.50
4/30/25	DMM	B250B		Call w/ D. Vespia re: petition re: modification of notice requirements.	.20	79.00

**TASK SUB TOTAL**

**\$ 2,024.50**

**B260B PENSION PLAN/PBGC ISSUES**

Date	Atty	Task	Actv	Description	Hours	Amount
4/01/25	MGR	B260B		Review emails regarding PBGC fees and budget concerns	.30	261.00



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Date	Atty	Task	Actv	Description	Hours	Amount
4/02/25	BLP	B260B		Review comms from PBGC re documents needed re termination of pension plan (.2); comms with client re same (.2)	.40	326.00
4/02/25	BLP	B260B		Comms with B. Diaz re components of PBGC claim and strategy re same	.30	244.50
4/02/25	MGR	B260B		Conf w/ B Pollack regarding PBGC issues and claim reconciliation.	.40	348.00
4/03/25	BLP	B260B		Further comms with PBGC re document requests	.20	163.00
4/04/25	BLP	B260B		Further comms with PBGC re document retention for pension termination	.20	163.00
4/07/25	BLP	B260B		Comms re call with PBGC to resolve record retention issues, claim issues	.20	163.00
4/07/25	MGR	B260B		Review PBGC claim issues and discuss w/ B Pollack	.60	522.00
4/08/25	BLP	B260B		Call with PBGC re record retention issues	.50	407.50
4/08/25	DV	B260B		Meeting w/ PBGC re: information requests.	.60	237.00
4/08/25	DV	B260B		Meeting w/ leadership team re: PBGC requests and related matters.	.40	158.00
4/14/25	BLP	B260B		Comms with client, B. Diaz and PBGC re PBGC termination package and status	.40	326.00
4/14/25	DV	B260B		Reviewed emails re: PBGC correspondence.	.20	79.00
4/15/25	BLP	B260B		Review comms re submission of documents to PBGC for plan termination and follow up call needed re same	.30	244.50
4/17/25	BLP	B260B		Further comms re call with PBGC re documents for termination of plan	.20	163.00
4/17/25	BLP	B260B		Discussion with K. Owens re stip on PBGC claims, calculation of interest needed	.20	163.00
4/21/25	DV	B260B		Reviewed correspondence from PBGC.	.30	118.50
4/22/25	DV	B260B		Reviewed draft questions to PBGC and email re: same.	.30	118.50
4/23/25	BLP	B260B		Comms with PBGC re claim interest, issues re termination of plan	.30	244.50

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Date	Atty	Task	Actv	Description	Hours	Amount
4/23/25	DV	B260B		Emails re: meeting w/ PBGC.	.30	118.50
4/24/25	BLP	B260B		Call with PBGC re termination of the plan, process, documents needed, claim payment	.80	652.00
4/24/25	BLP	B260B		Additional comms with PBGC re questions raised on termination call (.3); discussion with K. Owens re question on plan release vis a vis PBGC (.2)	.50	407.50
4/24/25	BLP	B260B		Comms with client re date of pension plan termination, tax filing necessity	.20	163.00
4/24/25	DV	B260B		Attended meeting w/ PBGC and reviewed materials in connection w/ same.	1.00	395.00
4/24/25	DV	B260B		Reviewed emails re: PBGC requests.	.40	158.00
4/25/25	BLP	B260B		Comms with client re PBGC record requests	.20	163.00
4/25/25	DV	B260B		Emails w/ client re: PBGC matters.	.30	118.50
4/28/25	BLP	B260B		Review comms from PBGC re payouts from pension plan and questions re same	.20	163.00
4/28/25	BLP	B260B		Review PBGC interest calculation and comms re same	.20	163.00
4/28/25	DV	B260B		Emails w/ B. Pollack, D. Polley, and J. Knapp re: meeting to discuss PBGC record request.	.20	79.00
4/28/25	DV	B260B		Reviewed email from PBGC re: records	.30	118.50
4/29/25	BLP	B260B		Call with client re PBGC records, best way to deal with same	.30	244.50
4/29/25	BLP	B260B		Comms with K. Owens re stip with PBGC in resolution of claim	.20	163.00
4/30/25	BLP	B260B		Further comms with K. Owens re PBGC claim stipulation	.20	163.00
4/30/25	DV	B260B		Emails w/ client re: pension plan administration.	.80	316.00
<b>TASK SUB TOTAL</b>						<b>\$ 8,035.50</b>

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### B310B RECORDS RETENTION

Date	Atty	Task	Actv	Description	Hours	Amount
4/08/25	BLP	B310B		Comms re record retention questions re veterans	.20	163.00
4/08/25	DV	B310B		Reviewed record retention question from client and responded to same.	.30	118.50
4/17/25	BLP	B310B		Comms re Iron Mountain access requirements under contract	.20	163.00
4/22/25	BLP	B310B		Comms with client re Iron Mountain contract execution	.10	81.50
TASK SUB TOTAL						\$ 526.00
TOTAL PROFESSIONAL SERVICES						\$ 64,099.00

### SUMMARY OF PROFESSIONAL SERVICES

Name	Hours	Rate	Total
BONNIE L. POLLACK	49.90	815.00	40,668.50
MATTHEW G ROSEMAN	14.90	870.00	12,963.00
ANDREW NITKEWICZ	.50	395.00	197.50
DINA VESPIA	21.40	395.00	8,453.00
DEIRDRE M MITACEK	2.20	395.00	869.00
RYAN GOLDBERG	2.40	395.00	948.00
<b>Total</b>	<b>91.30</b>		<b>\$ 64,099.00</b>

### DISBURSEMENTS

#### E107 DELIVERY SERVICES/MESSENGER

Date	Task	Description	Amount
4/04/25	E107	FEDEX, DELIVERY SERVICES/MESSENGER (E107), INV#8-8 08-19093 DTD 03/24/2025 SENT TO: CHAM HON. ROBERT LITTLEFIELD- US BANKRUPTCY COURT 03/17/25 BP/MR	17.40

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**SUB TOTAL \$ 17.40**

**E108 POSTAGE**

Date	Task	Description	Amount
4/01/25	E108	POSTAGE BP/KR	51.75
4/09/25	E108	POSTAGE 04/09/2025, SK/BP	93.84
4/14/25	E108	POSTAGE 04/14/2025, SK/BP	159.30
4/23/25	E108	POSTAGE 04/23/2025, SK/BP	58.41
4/29/25	E108	POSTAGE 04/29/2025, SK/BP	4.31
<b>SUB TOTAL</b>			<b>\$ 367.61</b>

**E112 COURT FEES**

Date	Task	Description	Amount
4/28/25	E112	CHASE CARD SERVICES, COURT FEES, CONFIRM #8347454847, DTD 05/10/2025 FOR ABANDONMENT MOTION FILING 04/09/25 CR/MR	199.00
<b>SUB TOTAL</b>			<b>\$ 199.00</b>
<b>TOTAL DISBURSEMENTS</b>			<b>\$ 584.01</b>
<b>TOTAL THIS INVOICE</b>			<b>\$ 64,683.01</b>

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#### TASK TIME SUMMARY

Task	Description	Hours	Amount
B100	GENERAL ADMINISTRATION	19.80	13,364.00
B120B	CASH COLLATERAL & DIP FINANCING	.60	511.00
B130B	ASSET DISPOSITION, SALE OR RESTRUCTURE	3.30	2,717.00
B140B	RESOLUTION OF CREDITOR ISSUES	6.10	5,021.00
B160B	PLAN & DISCLOSURE STATEMENT	14.40	11,852.00
B170B	LEASES & EXECUTORY CONTRACTS	.50	424.00
B180B	RETENTION/PROFESSIONAL COMPENSATION/FEE	2.00	1,630.00
B185B	PREPARATION FOR/ATTEND COURT HEARING	3.20	2,608.00
B210B	MOTION PRACTICE	9.50	6,667.00
B220B	OPERATING REPORTS	1.30	1,059.50
B230A	GOVERNANCE ISSUES	11.90	7,343.50
B240B	EDUCATION/REGULATORY MATTERS	.80	316.00
B250B	ENDOWMENT/ATTORNEY GENERAL MATTERS	4.70	2,024.50
B260B	PENSION PLAN/PBGC ISSUES	12.40	8,035.50
B310B	RECORDS RETENTION	.80	526.00
<b>TOTALS</b>		<b>91.30</b>	<b>\$ 64,099.00</b>

#### TASK DISBURSEMENTS SUMMARY

Task	Description	Amount
E107	DELIVERY SERVICES/MESSENGER	17.40
E108	POSTAGE	367.61
E112	COURT FEES	199.00
<b>TOTALS</b>		<b>\$ 584.01</b>